

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER  
DISTRICT JUDGE

*Dawson v Mylan Laboratories Ltd., et al*  
(Case No. 1:20-cv-01493-RBK-JS)

**PLAINTIFFS' CROSS NOTICE OF VIDEOTAPED DEPOSITION OF**  
**CHRISTOPHER JORDAN, M.D.**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Plaintiff will take the cross deposition upon oral examination of Dr. Christopher Jordan, on **October 29, 2021, at 10:00 a.m. EST**, and continuing until completion, at the offices of Yates, McLamb, & Weyher, LLP, located at 434 Fayetteville Street, Suite 2200, Raleigh, North Carolina, 27601. Additional counsel who wish to attend remotely will have the option to do so using audio visual conference technology and should contact Veritext at [valsartan@veritext.com](mailto:valsartan@veritext.com) to arrange for login credentials to be sent to them prior to the deposition. The deposition will be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The deponent is further requested to bring to the deposition those items requested in Exhibit A attached hereto.

Additionally, in accordance with paragraph B (1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the cross deposition. The attorney contact for the cross deposition is:

**David McClendon  
Watts Guerra, LLC**

**5726 West Hausman Rd. Ste. 119  
San Antonio, TX 78249  
Telephone: (210) 448-0500  
E-Mail: dmcclendon@wattsguerra.com**

Date: October 28, 2021

Respectfully submitted,

/s/ Paige N. Boldt  
Paige N. Boldt  
WATTS GUERRA LLC  
5726 West Hausman Rd. Ste. 119  
San Antonio, TX 78249  
Telephone: (210) 448-0500  
E-Mail: pboldt@wattsguerra.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of October 2021, I caused a true and correct copy of the foregoing Cross Notice of Videotaped Deposition of Dr. Christopher Jordan to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on October 28, 2021.

This 28th day of October 2021.

*/s/ Paige N. Boldt  
Attorney for Plaintiff*

**Exhibit A**

**Documents to be Produced**

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.